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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JENNIFER BRONSON, CLEMENT CHIN,
And KEVIN SHIMAMOTO,

Plaintiffs,

v.

UNITED STATES CUSTOMS & BORDER
PROTECTION,

Defendant.

Case No. 4:18-cv-03156 KAW

**SECOND STIPULATION TO EXTEND DATES
AND OPT OUT OF MULTI-OPTION ADR;
~~PROPOSED~~ ORDER**

HON. KANDIS A. WESTMORE

Plaintiffs, by and through their attorney of record, and Defendant, by and through its attorneys of record, hereby stipulate, subject to the approval of the Court, to the following:

- 1) Plaintiffs filed this action on or about May 25, 2018. Defendant answered on or about July 6, 2018. This matter was brought by Plaintiffs under the Freedom of Information Act ("FOIA") concerning a December 2017 FOIA request.
- 2) On August 14, 2018, Customs and Border Protection ("CBP") responded to the FOIA request, producing 380 pages of documents, many of which have been marked as duplicates and/or redacted pursuant to certain provisions of FOIA, including, but not limited to 5 U.S.C.A. §552(b)(5).
- 3) There are remaining issues concerning certain redactions, which the parties are in the process of

attempting to resolve informally. The parties believe that this informal process will be successful in resolving many of the remaining issues. The parties agree to use the time between the date of this stipulation and the Case Management Conference to continue working toward an informal resolution of any disputes related to redactions.

4) Accordingly, the parties respectfully request that (1) they be excused at this time from participating in the multi-option ADR process, including submission of the ADR certifications and stipulation; and (2) the Case Management Conference and remaining associated deadlines be extended as follows:

a. Last day for filing the Joint Case Management Statement shall be November 6, 2018.

b. The Initial Case Management Conference shall be November 13, 2018 at 1:30 p.m.

Date: August 28, 2018

Respectfully submitted,

ALEX G. TSE
United States Attorney

/s/
ALISON E. DAW¹
Assistant United States Attorney
Attorneys for Defendants

Dated: August 28, 2018

ORRICK HERRINGTON & SUTCLIFFE LLP

/s/
SUZETTE BARNES
Attorneys for Plaintiffs

¹ I, Alison E. Daw, hereby attest that I have been authorized to submit the electronic signatures indicated by a “conformed” signature (/s/) within this e-filed document. I apologize for any inconvenience caused by my failure to include this language in the original submission.

1 ~~PROPOSED~~ ORDER

2 Pursuant to stipulation, the parties are excused at this time from participation in the multi-option
3 ADR process, including submissions of ADR certifications and stipulation. The parties' last day to file
4 Case Management Statements shall be November 6, 2018. The Initial Case Management Conference
5 shall take place on November 13, 2018 at 1:30 p.m. in the courtroom of the Honorable Kandis A.
6 Westmore.

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8 IT IS SO ORDERED.

9 Date: 9/4/18

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11 KANDIS A. WESTMORE
12 United States Magistrate Judge
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